

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

PIERRE BRAZEAU, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, ERIC J. SCHOEN, JAMES W.
KUPIEC, NADAV FRIEDMANN and
MICHAEL MARSMAN,

Defendants.

Case No.: 1:21-cv-00751-RP

CLASS ACTION

WANDA NEWELL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, and ERIC J. SCHOEN,

Defendants.

Case No.: 1:21-cv-760-RP

KATLYN K. REIN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CASSAVA SCIENCES, INC., REMI
BARBIER, ERIC J. SCHOEN, JAMES W.
KUPIEC, NADAV FRIEDMANN, and
MICHAEL MARSMAN,

Defendants.

Case No.: 1:21-cv-856-RP

**NOTICE OF NON-OPPOSITION OF STEPHEN BRANCH TO
COMPETING MOTIONS FOR CONSOLIDATION, APPOINTMENT
AS LEAD PLAINTIFF AND APPROVAL OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD.

On October 26, 2021, pursuant to Fed. R. Civ. P. 42 and § 21(D)(a)(3)(B) of the Securities Exchange Act of 1934, as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), 15 U.S.C. § 78u-4(a)(3)(B), Stephen Branch (“Branch”) timely filed a motion for consolidation, appointment as lead plaintiff and approval of his selection of lead counsel in connection with the above-captioned securities fraud class actions. ECF Nos. 31-32 and 34-35. Eight similar motions were filed by other putative Class members. ECF Nos. 14, 17, 18, 20, 21, 24, 25, 33.

The PSLRA provides a presumption that the “most adequate plaintiff” to represent the interests of class members is the person or group that, among other things, has “the largest financial interest in the relief sought by the class.” 15 U.S.C. § 78u-4(a)(3)(B)(iii)(I). Having reviewed the competing motions and supporting papers provided by the other movants seeking appointment as lead plaintiff, it appears that Branch does not have the “largest financial interest.” However, in the event that the Court determines that other movants are incapable or inadequate to represent the class in this litigation, Branch remains willing and able to serve as lead plaintiff or as a named class representative.

DATED: October 29, 2021.

Respectfully submitted,

/s/ Thomas E. Bilek

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Counsel for Stephen Branch

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2021, a true and correct copy of the foregoing was filed by CM/ECF, which will automatically serve all counsel of record.

/s/ Thomas E. Bilek

Thomas E. Bilek